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June 14, 1991

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OUR FILE NUMBER
G 99999-00000

Chris Stubbs
South Coast Groundwater Section, H-6-4
United States Environmental Protection Agency
Post Office Box 193062
San Francisco, CA 94119-3036

Re: Hawker Pacific Inc.
11310 Sherman Way
Sun Valley, California; EPA Reference T-4-1

Dear Chris:

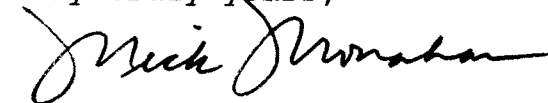
Enclosed is the response of Hawker Pacific Inc. to EPA's second request for information to it pertaining to the above facility delivered by letter dated March 14, 1991. Pursuant to my conversation with yourself and Marcia Preston, this response is timely. Also pursuant to those conversations, the company is submitting the most recent two years of tax returns and financial reports, and the financial reports are the one available recent year of audited financial statements for the company and are otherwise the financial statements of its parent entity (contained in its annual reports -- of which 3 are actually enclosed). Our agreement is that EPA's acceptance of fewer years financial data shall not preclude EPA from seeking the other years at some later time. I also enclose for your convenience a copy of Hawker Pacific's response to an earlier (February 1989) § 104(e) request (without exhibits). The current response refers in several places to the prior response.

GIBSON, DUNN & CRUTCHER

June 14, 1991
Page 2

If you have any questions regarding this response,
please call me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Mike Monahan", written in a cursive style.

Michael A. Monahan

MAM/par

cc: Marcia Preston, Asst. Regional Counsel, EPA

LA911650.031

MICHAEL A. MONAHAN
GIBSON, DUNN & CRUTCHER
333 South Grand Avenue
Los Angeles, California 90071
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Attorneys for
HAWKER PACIFIC INC.

BEFORE THE
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

In re Hawker Pacific Inc.,)	RESPONSE OF HAWKER
facility at 11310 Sherman)	PACIFIC INC. TO SECOND
Way, Sun Valley, California;)	EPA REQUEST FOR
San Fernando Valley)	INFORMATION PURSUANT TO
Groundwater Investigation)	CERCLA § 104(e)
)	

This response is made by Hawker Pacific Inc. ("Hawker Pacific") to the request for information under CERCLA § 104(e), 42 U.S.C. § 9604(e) ("Second EPA Request"), made by the United States Environmental Protection Agency ("EPA") by letter dated March 14, 1991, addressed to D. L. Lokken, regarding Hawker Pacific's facility at 11310 Sherman Way, Sun Valley, California 91352. Much of the information sought by the Second EPA Request was provided in response to EPA's request for information under CERCLA § 104(e), served by letter dated February 1989 ("First EPA Request"), by response dated July 7, 1989.

The persons who provided information regarding the facility included in these responses are Erik Johnson and Jeff Belzer, who are currently Hawker Pacific employees who can be contacted through Hawker Pacific counsel.

This response does not constitute any admission by Hawker Pacific that it has contributed to or is responsible for the San Fernando Valley groundwater contamination referred to in the EPA's request, and Hawker Pacific denies any such contribution or responsibility.

This response includes certain exhibits as to which Hawker Pacific claims confidentiality pursuant to CERCLA § 104(e)(7)(E) and (F). These exhibits are enclosed in separate envelopes marked to indicate confidentiality.

Hawker Pacific objects to Instruction 3 of the Request insofar as it seeks to establish a continuing obligation upon Hawker Pacific to report information subsequently discovered or learned by Hawker Pacific, on the grounds that such a continuing request is beyond the scope of EPA authority under CERCLA § 104(e) and would be impracticable or impossible to implement.

Without waiving the foregoing qualifications and objections, Hawker Pacific further responds to the Requests as follows:

- 1. List the EPA RCRA Identification Numbers of the Respondent, if any.**

The EPA I.D. Number for this site is CAT 000646257.

2. Describe the nature and dates of present and past operations at the facility.

Hawker Pacific overhauls and repairs, and manufactures, aircraft landing gear and flight control equipment at this facility. The operations at the site consist of receiving and inspection of material and equipment, machining and grinding, plating, painting, assembly and testing of new and reassembled equipment. Hawker Pacific has conducted such operations at the site since April 1, 1987, when it purchased assets for that purpose from Inchcape PLC. At that time, its facility included buildings currently numbered 1, 2, 3 and 5. In December 1987, its facility was expanded to include the building currently numbered No. 4. (These building numbers have changed over time: Current Buildings 4 and 5 were referred to as Buildings 5 and 4, respectively in Hawker Pacific's response to First EPA Request.) See the response to Question 5, below, regarding the operations at the site prior to Hawker Pacific's.

3. Identify the current owner(s) of the facility. State the dates during which the current owner owned, operated, or leased any portion of the facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including, but not limited to, purchase and sale agreements, deeds, and leases.

The property under Buildings 1, 2 and 3 is owned by Gordon Wagner and Joseph Bassinger, and Hawker Pacific believes it has been since 1963. During the period 1963 to 1969, the owners operated a business known as Stellar Hydraulics on part of the current site. From 1969 to April 1987, Hawker Pacific believes, the owners leased the property to (or otherwise allowed it to be used by) the companies identified in the response to Question 5, below. Since April 1987, the owners have leased the property to Hawker Pacific. A copy of the current lease is submitted herewith as Exhibit 1.

The property under Buildings 4 and 5 is owned by Industrial Bowling Corp. Hawker Pacific does not know how long Industrial Bowling has owned the property. From 1967 to April 1987, Hawker Pacific believes, the owner leased the Building 5 property to (or otherwise allowed it to be used by) the businesses identified in the response to Question 5, below. Since April 1987, the owners have leased the property to Hawker Pacific. A copy of the lease is submitted herewith as Exhibit 2. For some period prior to December 1987, the owner leased the Building 4 property to (or otherwise allowed it to be used by) Laura Scudder or a Laura Scudder distributor. Since December 1987, the owner has leased

the property to Hawker Pacific. A copy of the lease is submitted herewith as Exhibit 3.

4. Identify all prior owners of the facility. For each prior owner further identify:

- a. The dates of ownership;
- b. All evidence that hazardous materials were released or threatened to be released at the facility during the period that they owned the facility.

Hawker Pacific does not know the identity of the prior owners of the properties referred to in response to Question 3.

5. Identify the prior operators and lessees of the facility. For each such operator or lessee, further identify:

- a. The dates of their operations at or lease of the facility;
- b. The nature of their operations at the facility;
- c. All evidence that hazardous materials were released or threatened to be released at the facility during the period in which they were operating at the facility.

a.	<u>Period (Approx.)</u>	<u>Operator</u>	<u>Buildings</u>
	1963-1969	Stellar Hydraulics	1, 2, 5
	1969-1977	Canoga Industries	1, 2, 5
	1977-1979	Zero Corporation	1, 2, 3, 5

1979-1980	Bertea Corporation	1, 2, 3, 5
1980-1982	Parker Hannifin Corp.	1, 2, 3, 5
1982-1987	Inchcape PLC	1, 2, 3, 5
? - 1987	Laura Scudder	4

- b. The prior operators in Buildings 1, 2, 3 and 5 operated businesses generally similar to Hawker Pacific's current business, except that the rotor wing operations were added by Bertea and continued by subsequent operators, and except that Hawker Pacific did not use some of the solvents or other chemicals used by prior operators at the site (as discussed further in response to part (c) of this Question, below).

The prior operator in Building 4 operated a warehouse/delivery truck maintenance facility for Laura Scudder food products.

- c. Analyses of soil samples taken from the leach field area of the Building 4 septic tank system showed trace amounts of toluene and perchloroethylene ("PCE"). Analyses of soil samples from the leach field of the building 3 septic tank system also showed trace toluene. Hawker Pacific has not used PCE at this facility. Hawker Pacific has not used products containing toluene in Buildings 3 or 4, or disposed of any

such product in the Building 3 or 4 septic tank systems. Moreover, lacquer thinner, the product Hawker Pacific has used at the facility containing toluene, also contains other chemicals that were not detected in either leach field. Hawker Pacific believes that Laura Scudder, the prior operator at Building 4, conducted vehicle maintenance operations there; this belief is based, among other things, on used oil filters and other similar materials left at the site by Laura Scudder. Records of prior operators at Buildings 1, 2, 3 and 5 retained by Hawker Pacific indicate that prior operators on those portions of the site used PCE, but only until the early 1980's. (The trace levels of toluene and PCE found in the leach field areas do not threaten groundwater and were deemed insignificant by the Regional Water Board.) Shallow soil samples from the area adjacent to the clarifier in Building 2 also show trace quantities of toluene and PCE. PCE, as stated above, has not been used by Hawker Pacific at the site. No product containing toluene was used or disposed of by Hawker Pacific in this area.

Soil samples taken in the area of a small unused underground tank and an adjacent small sump

between Buildings 1 and 2 contained hydrocarbons (oil), PCE, TCE, TCA, toluene and xylene. The tank was not used by Hawker Pacific and its presence was not discovered by Hawker Pacific until 1989. As stated above, Hawker Pacific has not used PCE at this facility. Hawker Pacific stored in this area only new machine lubricants unlike the chemicals detected in the soil here.

6. Provide a scaled map of the facility which includes the locations of significant features. Describe the physical characteristics of the facility, including, but not limited to, the following:
 - a. Surface structures (e.g., building, tanks, etc.);
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
 - c. Ground water wells and dry wells, including drilling logs;
 - d. Past and present storm water drainage system, sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
 - e. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the facility, or to the property itself (e.g., excavation work) and state the dates on which such changes occurred.

See diagram and key with descriptions, submitted herewith as Exhibit 4.

7. Provide all existing technical or analytical information about the facility, including, but not limited to, data and documents related to soil, water (ground and surface), geology, hydrogeology, or air quality on and about the facility.

See reports submitted herewith as Exhibits 5, 6, 7 and 8.

8. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrogeology, or air quality on or about the facility? If so, identify:

- a. The nature and scope of these investigations;
- b. The contractors or other persons that will undertake these investigations;
- c. The purpose of the investigations;
- d. The dates when such investigations will take place and be completed;
- e. Where on the facility such investigations will take place.

See work proposal dated May 22, 1991 submitted herewith as Exhibit 9. The work set forth therein is scheduled to begin this month; and it is anticipated that it will be completed in three to four months.

9. Did you acquire the facility after the disposal or placement of the hazardous substances on, in, or at the facility? Describe all of the facts on which you base the answer to this Question.

Hawker Pacific is a lessee. See response to Question 5 above.

10. At the time you acquired the facility, did you know or have reason to know that any hazardous substance was disposed of on, in, or at the facility? Describe all investigations of the facility that you took prior to acquiring the facility, and all of the facts on which you base the answer to this Question.

Hawker Pacific is a lessee. At the time it began operations at the property it did not know or have reason to know of any such disposal. Hawker Pacific did a walk-through inspection.

11. Did you ever transport to the facility or use, purchase, generate, store, treat, dispose, or otherwise handle at the facility any materials, either hazardous or non-hazardous? If the answer to this question is anything but an unqualified "no," identify:

- a. In general terms, the nature and quantity of the non-hazardous materials so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;

- b. The common chemical name, specific chemical name, Chemical Abstract Service (CAS) number, chemical composition, characteristics, and physical state (e.g., solid, liquid, gas) of each hazardous material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. The persons who supplied you with such hazardous material or how each such hazardous material was generated by you;
- d. How each such hazardous material was transported, used, purchased, stored, treated, disposed, or otherwise handled by you;
- e. When each such hazardous material was transported, used, purchased, generated, stored, treated, disposed, or otherwise handled by you;
- f. Where each such hazardous material was used, purchased, generated, stored, treated, disposed, or otherwise handled by you, describing the location(s) and providing a map or diagram of such location(s). Location information should include, but is not limited to, information pertaining to tanks, ponds, treatment facilities, and other units which were historically used to generate, store, treat or dispose of hazardous materials, but which may no longer exist;

- g. The persons who transported and/or disposed of each such hazardous material. If disposal off of the facility occurred, provide a detailed description, including copies of manifests, and identify the location where the hazardous material was transported;
- h. The annual quantity of each such hazardous material used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you, reported in gallons for liquids and pounds for solids.

(See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2.)

- a. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2.
- b. See Hawker Pacific Inc.'s Response to EPA's First Request, Questions 1 and 2. Hawker Pacific also uses and has used at the facility the following chemicals in the approximate current volumes shown: Sulfuric Acid (2200 lbs/yr); Muriatic (Hydrochloric) Acid (HCL) (1200 lbs/yr); Hydrofluoric Acid (60 gallons); Chromic Acid Flakes (2000 lbs/yr); Fluoroboric Acid (1620 lbs/yr). Material Safety Data Sheets providing further information on the composition and of the

chemicals used by Hawker Pacific are supplied herewith as Exhibit 10.

- c. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2. The primary current suppliers of the chemicals referred to in response to paragraph (b) of this Question are:

Millhorn Chemical and Supply Company
6142 Walker Avenue
Maywood, California 90270
(213) 771-8301
Plating chemicals and supplies

Rho-Chem Inc.
Post Office Box 6021
Inglewood, California 90301
Solvents supplier

LT Saver
Shell Oil Distributor
14117 Aetna Street
Van Nuys, California 91401
Oils and fluids supplier lubricating oils
and hydraulic fluids

- d. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1, 2 and 4.
- e. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2. Hawker Pacific has generated or handled the materials described therein throughout the period it has operated at the site.
- f. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2.
- g. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2. Hawker Pacific

provided copies of manifests with its last response. Copies of subsequent manifests are supplied herewith as Exhibit 11.

h. See Hawker Pacific Inc.'s Response to First EPA Request, Questions 1 and 2.

- 12. Identify all leaks, spills, releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the facility. In addition, identify:**

See responses to Questions 5 and 7 above. Without determining or conceding that the materials involved are hazardous as defined, Hawker Pacific states that it has certain air emissions from permitted equipment or from activities exempt from permitting by the South Coast Air Quality Management District. Hawker Pacific will provide additional information on such air emissions upon request.

- 13. If any releases or threatened release identified in response to Question 12, above, occurred into any subsurface disposal system, floor drain, sump, or dry well inside or under any buildings located on the facility, further identify:**

- a. Precisely where the disposal system, floor drain, sump, or dry well is and was located;**
- b. When the disposal system, floor drain, sump, or dry well was installed;**

- c. Whether the disposal system, floor drain, sump, or dry well was connected to pipes;
- d. Where such pipes are or were located, describing the location(s) and providing a map or diagram of such location(s);
- e. When such pipes were installed;
- f. How and when such pipes were replaced, repaired, or otherwise changed.

See responses to Questions 5 and 7 above.

14. Is the facility currently connected to a sewer line? If so, identify the sewage system, date of connection, and type of wastes discharged. If you are or at some time operated the facility without a sewer line connection, identify the method of waste disposal that you use or did use. Specifically, have you or are you using leach field(s), septic tank(s), or any other method of disposal at the facility. Provide copies of any sewer permits, including but not limited to industrial waste permits.

Buildings 1, 2 and 5 of the facility are connected to a sewer line. See sewer permit submitted herewith as Exhibit 12. Buildings 3 and 4 have septic tank systems with leach fields for their sanitary sewage discharges.

15. Describe any acts or omissions of any persons, other than your employees, agents, or those persons with whom you had a contractual relationship, that may have caused

the release or threat of release of hazardous substances at the facility and damages relating therefrom and identify such persons. In addition:

- a. Describe all precautions that you took against foreseeable acts or omissions of any such third parties, and the consequence that could foreseeably result from such acts or omissions;
- b. Describe the care you exercised with respect to the hazardous substances found at the facility.

See response to Question 5 above.

16. Identify all liability insurance policies held by Respondent from the time Respondent began operations at, assumed ownership of, or began leasing the facility (whichever occurred earlier) until the present. In identifying such policies, state:

- a. The name and address of each insurer and of the insured;
- b. The amount of coverage under each policy;
- c. The commencement and expiration dates for each policy;

In addition, submit a complete copy of each policy.

Copies of insurance policies are submitted herewith as Exhibits 13 - 17. These policies are confidential and proprietary under 42 U.S.C. § 9604(e)(7)(E) and (F) and are enclosed in separate envelopes so marked.

- a. Name and address of insurance company: Chubb
Group of Insurance Companies, 15 Mountain View
Road, Warren, New Jersey 07060.
- b. See policies submitted herewith.
- c. Insurance coverages commenced at the date of HPI's
acquisition on April 1, 1987 and renew annually on
October 1.

**17. Provide copies of all income tax returns including all
schedules sent by you to the federal Internal Revenue
Service in the last five years.**

Copies of the 1988 and 1989 Federal Income Tax Returns
are submitted herewith as Exhibits 18 and 19. These
returns are confidential and proprietary under 42
U.S.C. § 9604(e)(7)(E) and (F) and are enclosed in
separate envelopes so marked.

**18. Provide all financial statements for the past five
fiscal years, including but not limited to those filed
with the federal Internal Revenue Service, the Franchise
Tax Board, any other state taxing authorities, and the
Securities and Exchange Commission.**

Copies of the 1988, 1989 and 1990 Annual Reports of
Hawker Siddeley are submitted herewith as Exhibits 20 -
22. Copies of 1989 Financial Statements for Hawker
Pacific are submitted herewith as Exhibit 23. Hawker
Pacific has no audited financial statements for 1988 or
1990.) These financial statements are confidential and

proprietary under 42 U.S.C. § 9604(e)(7)(E) and (F) and are enclosed in separate envelopes so marked.

- 19. Identify all of Respondent's current assets and liabilities.**

See response to Question 18 above.

- 20. Identify all subsidiaries and parent corporations of Respondent.**

HPI is a wholly-owned subsidiary of Hawker Pacific Pty Ltd (Australia) which in turn is a wholly-owned subsidiary of Hawker Siddeley Group PLC (UK).

- 21. Provide a copy of the most current Articles of Incorporation and By-laws of Respondent.**

Copies of the Articles of Incorporation and By-laws are submitted herewith as Exhibits 24 and 25.

- 22. Identify the managers and majority shareholders or partners of Respondent and the nature of their management duties or amount of shares held, respectively.**

As to shareholders, see response to Question 20 above.

As to managers, Hawker Pacific has a number of salaried employees who might be considered management. The primary management personnel for the site are:

David L. Lokken, Executive Vice President and Chief Operating Officer, responsible for the overall day-to-day management; Jeff B. Belzer, Vice President Finance and Administration, responsible for the financial and


administrative requirements of the company; Robert D. Griswell, Vice President Commercial Operations responsible for factory operations as well as sales and marketing.

Dated: June 14, 1991

Respectfully submitted,

MICHAEL A. MONAHAN
GIBSON, DUNN & CRUTCHER

By:


MICHAEL A. MONAHAN
Attorneys for HAWKER PACIFIC
INC.

2825u

LA911630.016

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Attorneys for
HAWKER PACIFIC INC.

BEFORE THE
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

In re Hawker Pacific, Inc.,)
facility at 11310 Sherman)
Way, Sun Valley, California;)
San Fernando Valley)
Groundwater Investigation)

EPA Reference T-4-1

RESPONSE OF HAWKER PACIFIC INC.
TO REQUEST FOR INFORMATION
PURSUANT TO 42 U.S.C. § 9604(e)

RESPONSE OF HAWKER PACIFIC INC.

TO REQUEST FOR INFORMATION

PURSUANT TO 42 U.S.C. § 9604(e)

This response is made by Hawker Pacific Inc. ("Hawker Pacific") to the request for information under 42 U.S.C. §§ 9604 and 6907 made by the United States Environmental Protection Agency ("EPA") by letter dated February 1989, addressed to Robert E. (Bob) Wilson, regarding Hawker Pacific's facility at 11310 Sherman Way, Sun Valley, California 91352. This response does not constitute any admission by Hawker Pacific that it has contributed to or is responsible for the San Fernando Valley groundwater contamination referred to in the EPA's request, and Hawker Pacific denies any such contribution or responsibility.

The following sets forth each question in the EPA request, followed by Hawker Pacific's response thereto.

1. A description of the purpose and operations of your facility including a detailed description of any hazardous waste storage, treatment, or disposal operations. Include the dates of operation.

Response:

Hawker Pacific overhauls and repairs, and manufactures, aircraft landing gear and flight control equipment at this facility. It has conducted operations at the site since April 1, 1987, when it purchased assets for that purpose from Inchcape PLC. At that time, its facility included Buildings 1 through 4

(see Response to Request No. 3, below). In December 1987, its facility was expanded to include Building No. 5.

Hawker Pacific's operations at the site consist of receiving and inspection of material and equipment, machining and grinding, plating, painting, assembly and testing of new and reassembled equipment.

Operations at the site generate the following waste streams:

1. Plating shop wastes: (a) Plating shop production trash consisting of tape and masking materials is collected in steel drums. (b) Spent plating baths are periodically pumped out of the equipment and absorbent is added to it in steel drums. (c) Plating tank sludge also is periodically pumped out and absorbent is added in steel drums. (d) Plating operations rinse water is directed to a clarifier tank prior to discharge to the publicly owned treatment works ("POTW"). Clarifier sludge is periodically pumped out, and dewatered using an onsite press. The sludge is placed in steel drums, and the water is returned to the clarifier tank. Steel drums of all these plating shop wastes are hauled offsite to a permitted disposal site.

2. Several other types of miscellaneous liquid wastes are generated by the equipment used at the site: machinery waste oil, water soluble coolant from metal-working machinery, magnetic particle oil used for product testing, spent hydraulic fluids, degreasing solvents and paint thinners and solvent. These liquids are collected in steel drums and shipped offsite for recycling or disposal.

Steel drums in which the waste is accumulated are stored temporarily in a paved storage compound in the yard at the facility. These operations and waste streams have remained essentially the same since Hawker-Pacific began operations at the facility.

2. A detailed description of all hazardous substances and hazardous wastes that were or are used or produced in operation or in production-related processes at your facility(s). Of particular importance is your information regarding past and present chlorinated solvent usage including but not limited to carbon tetrachloride (CTC), trichloroethylene (TCE), and tetrachloroethylene (PCE). For each substance and each waste used or generated, provide the following information.
 - a. The common chemical name, specific chemical name, and chemical composition by volume for liquids and weight for solids;
 - b. The total amount, in gallons for liquids and tons for solids, or annual usage or generation;
 - c. The methods and processes used to generate, store, treat, and dispose of, and otherwise handle each substance;
 - d. When and where the above processes occurred and are occurring. Please specify dates and locations as precisely as possible. Location information should include, but not limited to, information pertaining to tanks, ponds, treatment facilities, and other units which were historically used to treat, store and/or dispose of hazardous substances but which may no longer exist.

Response:

The following is a list of the hazardous materials used, stored, or produced at this site:

Liquid Wastes:

Shell Tellus Oil

Hydrocarbon Mixture 99%

55 Gallons a Year Usage

Used for lubricating machinery in the machine shop areas in Buildings 1 and 2.

Disposed of by recycling off-site

Shell Garia Oil-C-
Hydrocarbon Mixture 99%
50 gallons a year usage
Used for lubricating machinery in the machine shop areas in
Buildings 1 and 2
Recycled off-site

Trichloroethane
Trichloroethane 1.1.1. 100%
600 Gallons a Year Usage
Used for degreasing machined parts in the plating shop area in
Building 2
Recycled off-site

Red Oil
Hydraulic Fluid H-5606
Mixture 99% CAS# 64742-46-2, 64741-97-5, 64742-53-6
250 gallons a year usage
Used to fill and test hydraulic units before shipment, in the
test room in Building 3
Disposed of by recycling off-site

Methylene Chloride
Methylene Chloride 100% CAS# 75-09-2
50 gallons a year usage
Used in assembly of the components in the assembly department in
Building 3
Recycled off-site

Rho-Solv 1204
Rho-Solv 1204 100% CAS# 64742-89-8
1200 gallons a year usage
Used to clean parts and machinery in Buildings 2, 3 and 4
Recycled off-site

✓ Mag-Oil-C
Deodorized Kerosene 96% Parafins, 2% Benzene
200 gallons a year usage
Used in magnetic particle inspection equipment in solvent tanks
in NDT (non-destructive testing) Department in Building 2
Recycled off-site

Rubbing Alcohol
Isopropyl Alcohol
60 gallons a year usage
Used to clean hydraulic equipment during assembly process in
Building 3
Recycled off-site

Chase 310

Lacquer Thinner 22% Toluene, 50% Ketone, 5% Glycolethers, 22% Petroleum Hydrocarbons
150 gallons usage

Used for cleaning parts to be painted, paint gun cleanup and thinning of paints in Building 4
Recycled off-site

MEK

Methyl Ethyl Ketone 100% CASE# 78-93-3
70 gallons a year usage

Used for cleaning parts in plating and assembly and test departments in Buildings 2 and 3
Recycled off-site

Water Soluble Coolant

Waste Oil and Water

3000 gallons a year usage

Used for cooling during grinding and metal working in machine shop areas in Buildings 1 and 2
Recycled off-site

Solid Wastes:

Cyanide/Cadmium Waste

3/4 cubic yards a year

Plating tank sludge, spent plating solution in plating shop in Building 2

Land fill disposal

Nickel Waste

3/4 cubic yards a year

Plating tank sludge, spent plating solution in plating shop in Building 2

Land fill disposal

Chromium Waste

7 cubic yards a year

Plating tank sludge, spent plating solution in plating shop in Building 2

Recycled off-site

Metal Hydroxide Waste

2 cubic yards a year

Waste water treatment solids from the treating of metal finishing rinse water

Recycled off-site

Oil and Grease Waste

3/4 cubic yards a year

Residue from oil product drums, from storage tank for water soluble coolant in yard storage

Recycled off-site

Production Trash:

Masking Tape and Materials

From Building 2 plating shop as described in response to request No. 1 above

Land Fill Disposal

All of the materials referred to above are used in and handled by machinery, vessels, other equipment, piping or drums (both before and after becoming waste or recyclable materials) located above concrete or paved floors or pads so that any liquid leak or release would be promptly visible, with two exceptions: The plating waste water clarifier tank in Building 2 is partially below grade, and hydraulic fluid (red oil) and related compressor oil drips used for testing equipment are captured with compressor condensate water in two small sumps (approx. 18" x 18" x 18" each) located next to each other outside Building 3. A sample boring has been placed in the location of the plating clarifier. (See Response to Request No. 8.) The integrity of the two small sumps is and has been readily ascertained by visual inspection.

3. Any photographs, maps, diagrams regardless of their date, which show areas where hazardous substances or hazardous wastes have been made or may be located.

Response:

See enclosed facility diagram, document "A".

4. A description of past and present disposal practices of hazardous substances and hazardous wastes generated or used at your facility. If off-site disposal of wastes has occurred, please provide a detailed description, including copies of manifests of hazardous substances and hazardous wastes, the names and addresses of transporters that have ever been engaged for the purpose of transporting hazardous substances or hazardous wastes from your facility, and the location to where the waste was hauled.

Response:

See responses to Requests 1 and 2, above. Hawker Pacific's past and present hazardous waste disposal practices are: All hazardous substances for disposal are profiled (sampled and analyzed), packaged and transported by an approved transporter to a disposal site or recycler that is authorized to accept that substance.

Enclosed are copies of manifests covering from 1987 to present date, document nos. HP000001 - HP000042.

Transporters used:

Disposal Control Inc.
1369 W. 9th Street
Upland, CA 91786

King & King Drain Oil Service
635 Obispo
Long Beach, CA 90814

Locations to which materials were hauled are shown on the manifests.

5. Locations and detailed descriptions of all monitoring wells, supply wells, injection wells, and underground tanks at your facility.

Response:

One underground tank, which has not been used by Hawker Pacific, recently has been discovered at the back of Building 1,

between Buildings 1 and 2. (See diagram supplied in Response to Request No. 3.)

6. Is your facility(s) currently connected to a sewer line? If so, please identify the sewage system, date of connection, and types of wastes discharged. If you are or at some time operated your facility(s) without a sewer line connection, please identify the method of waste water disposal that you use or did use. Specifically, have you or are you using leach field(s), septic tank(s), or any other method of onsite disposal.

Response:

Site Buildings Nos. 1, 2, and 4 are connected to a POTW sewer line. Waste streams discharged into this sewer are biological waste, and plating rinse waters that have been pretreated as described in Response to Request No. 1, above. These sewer connections have been in place since Hawker Pacific began operations at these portions of the site in April 1987.

Buildings Nos. 3 and 5 are connected to septic tanks with leach lines. These have been in place since Hawker Pacific began operations at these portions of the site, in April and December 1987, respectively.

7. All analyses from sampling of monitoring and supply wells, underground tanks, soil samples, and soil-gas sampling conducted at your facility. Please include any reports written by consultant(s) about these sample analyses.

Response:

Pursuant to direction of the California Regional Water Quality Control Board, Los Angeles Region ("LARWQCB"), on December 1, 1988, Law Environmental Inc. performed a subsurface investigation at two locations on this site to determine if any

subsurface contamination to soil or ground water had occurred.

The report is produced herewith, document "B".

8. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, geohydrology, or air quality on or about the site? If so, please describe the planned investigation(s).

Response:

Hawker Pacific has been requested by California Regional Water Quality Control Board to perform an additional two borings in the area of Building 3 and 5 to a depth of 40 feet as well as two borings inside Building 2 to a depth of 10 feet. Final results are not yet received. Air emissions testing was conducted February 13, 1989 by Truesdail Labs to determine total and hexavalent chrome from this facility's three hard chrome plating tanks.

9. A list of all current and former employees, agents, contractors, consultants, company officers, and other personnel who may possess knowledge or information relevant to this inquiry. This list should include each individual's name, address, telephone number, and job title or function.

Response:

<u>Name</u>	<u>Address & Phone No.</u>	<u>Title</u>	<u>Term. Date</u>
Erik Johnson	FX-6: Personal Privacy	Hazardous Waste/ Process Supervisor	
Harry Gunn	FX-6: Personal Privacy	Machine Shop Supv.	
Bud Bailes	FX-6: Personal Privacy	Plater Journeyman/ Lead	
Ed Conley	FX-6: Personal Privacy		

<u>Name</u>	<u>Address & Phone No.</u>	<u>Title</u>	<u>Term. Date</u>
Stan LaSalle	FX-6: Personal Privacy [REDACTED]	EPA/Hazardous Waste Engineer	3-4-88
Lewis Augustine	FX-6: Personal Privacy [REDACTED]	Supervisor Sr.	7-31-87

10. Length of time your company has been at the site location and any information you have regarding former occupants of this location and their hazardous waste practices.

Response:

Hawker Pacific has occupied this site from April 1, 1987, except it has occupied Building 5 since December 1987. Prior operators at the site excluding Building 5, based on information and belief, were:

Inchcape PLC.	6-1-82 to 4-1-87
Parker Corp.	Approx. 1980 to 6-1-82
Bertea	Approx. 1979-1980
Zero Corporation	Approx. 1977-1979
Canoga Industries	Approx. 1968-1977
Stellar Hydraulics	Approx. 1963-1969 (Buildings 1 and 2 only)

Some of these may not have occupied the entire site of Buildings 1 - 4.

The company occupying Building 5 immediately prior to Hawker Pacific was Laura Scudder. Hawker Pacific lacks information as to other prior occupants of Building 5.

11. Any information regarding use and disposal of chlorinated solvents by any person or business in the San Fernando Valley.

Response:

Hawker Pacific objects to this request as beyond the scope of EPA's authority. Without waiving this objection, Hawker Pacific produced herewith copies of manifests relating to prior operators at this location that Hawker Pacific possesses, as documents no. HP000043 - HP000128.

12. A descriptive list of all insurance policies held by your company. The description should include the dates during which each policy was in force, the general type of policy (e.g., comprehensive, general liability, automobile), the insurance company issuing the policy, the policy number, and any specific provision of the policy which may relate to claims for environmental damages.

Response:

See document entitled "Hawker Pacific Inc. Insurance Policy List, document "C", produced herewith in a separate envelope labelled as confidential information. This document and the information contained therein is confidential and subject to 40 C.F.R. § 2.203(b), and is to be so treated.

13. A detailed description of all hazardous substance and hazardous waste spills, leaks and incidents, as well as any clean-up actions undertaken during the history of your facility's operation.

Response:

No known spills, leaks or incidents during Hawker Pacific's operation at this location.

14. A list of the names and addresses of all solvent suppliers and solvent recyclers from which either products or services were acquired for use by your facility.

Response:

Rho-Chem Corp P.O. Box 6021 H25-Isis Ave. Inglewood, CA 90301	Supplier and recycler
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PRI 1835 E. 29th Street Signal Hill, CA	Recycler
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DeMenno-Kerdoon 2000 N. Alameda Street Compton, CA 90222	Recycler
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Casmalia Resource Management NTU Road Casmalia, CA 93429	Recycler
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Shell Oil Co. 14117 Aetna Van Nuys, CA 91408	Supplier
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Holchem Chemical 13546 Desmond Street Pacoima, CA 913131	Supplier
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15. An audited set of financial statements which includes a Statement of Financial Position/Balance Sheet, Income Statement, and Statement of Changes in Working Capital, and any other supplementary information for your company's most recent fiscal year.

Response:

See financial statements, document "D", produced herewith in a separate envelope labelled as confidential information. This document and the information therein is confidential subject to 40 C.F.R. § 2.203(b), and is to be so treated.

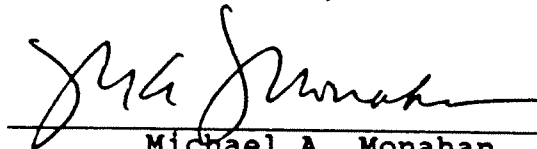
16. Are you owned by another corporate entity as a subsidiary, division, or otherwise?

Response:

Yes. See document produced in response to Request No.

DATE: JULY 7, 1989

RICHARD J. DENNEY
MICHAEL A. MONAHAN
LAURA J. CARROLL
MCCUTCHEN, BLACK, VERLEGER & SHEA

A handwritten signature in dark ink, appearing to read "Michael A. Monahan", is written over a horizontal line.

Michael A. Monahan

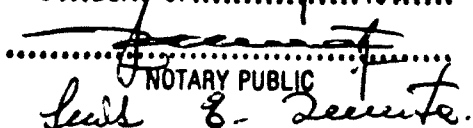
Attorneys for HAWKER PACIFIC INC.

I, Robert E. Wilson, Vice President and General Manager of Hawker Pacific Inc. (the "Company"), directed employees under my supervision in a search for records in the possession of the company and in interviewing company employees with knowledge of the company's operations, chemical use and business practices, for purposes of preparing the responses to which this is attached. I believe that the search and interviews were diligent and, based thereon, that the factual responses to which this is attached are correct.

DATE: July 7, 1989



ROBERT E. WILSON

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 7th DAY OF July, 1989.

NOTARY PUBLIC
Luis E. Zurita

